Quest Diagnostics Incorporated

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October 22, 2001

Robert L. Stephenson II, M.P.H.
Director, Division of Workplace Programs, CSAP
5600 Fishers Lane
Rockwall II, Suite 815
Rockville, Md. 20857

Dear Mr. Stephenson.

On behalf of Quest Diagnostics Incorporated, it gives us great pleasure to provide comments to the Notice of proposed revisions, published in the Federal Register on Tuesday August 21st, 2001 for the Mandatory Guidelines for Federal Workplace Drug Testing Programs 43876-43882.

There are two specific issues we would like to comment on:

1. In section 2.4 in the added paragraph (g) Validity testing, the proposed revision requires a certified laboratory to perform validity testing. In item (i), it is clear when validity testing is required for creatinine, specific gravity and pH. As stated creatinine and pH is required for all specimens and specific gravity is required when the creatinine value is < 20 mg/dL. Item (iv) as stated does not provide unequivocal clarity as to when validity test(s) for oxidizing adulterants are to be performed. In items (i) and (iii), the revision specifies that these validity tests must be performed " on every specimen". In item (iv) the phrase "on every specimen" is omitted. Our recommendation is that item (iv) be modified to read as follows: "Shall perform validity test(s) for substances that are commonly known as oxidizing adulterants on every specimen; and." The addition of "on every specimen" in this item will remove any doubt as to when validity test(s) for oxidizing substances should be performed.

2. In section 2.5 (g) Specific requirements for measuring pH, item 5(i) and (ii), the revision outlines the required controls for the initial test. It requires controls in the ranges of 2 to 2.9 and 11.1 to 12. It, however, does not specify that a control should be within acceptable pH range, which is usually between 4.0, and 9.0 for most automated pH procedures on initial screening instruments. The revision should be amended to include a control in the acceptable range.

Lastly, Quest Diagnostics Incorporated supports the proposed rulemaking that requires validity testing on all specimens.

Respectfully submitted,

Paul S. Belyus

Paul S. Belyus
Director of Laboratory Operations